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only in response to a request for information or provides unsolicited information to persons about whom the system has stored interests or characteristics (see page 6, lines 5-10). As such, the information sent to users by way of Lalonde's individualized catalogue does not correspond to "a notice of prize information," as recited in pending independent claims 1 and 7. That is, it is clear that merely matching product information to the buyer's stored interests or characteristics does not encompass sending the prospective buyer a notice of prize information, especially since the buyer will be required to purchase any product matching their stored interests. There simply is no prize information directed at the buyer.

Moreover, because Lalonde does not disclose or suggest that a "notice of prize information" is sent to a user of the system, there is no disclosure or suggestion in Lalonde of a "notice control module" that controls the prize information, as recited in pending independent claims 1 and 7. As discussed in the June 28, 2004 Amendment, Lalonde's individualized electronic catalogue does not function to solicit information from a buyer, but is sent to buyers in response to information that the buyers have already input into the system. Again, sending the buyer product information that matches their stored interests does not encompass prize information, as claimed.

Furthermore, the users of Lalonde's system cannot reasonably be considered "applicants who applied for the prize information," as recited in pending independent claims 1 and 7, because Lalonde does not disclose or suggest a registration control module for registering the attributes of applicants who applied for the prize information, as claimed. That is, the users of Lalonde's system are not applicants within the meaning of the present claims because they must purchase any product that matches the buyer's profile.

Applicant is, quite frankly, mystified that the PTO is still rejecting the pending claims over Rogers. Rogers discloses only that the system registers product information, and does

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not even register information in system about a consumer who has applied for a prize, as claimed. As such, even if one were to ignore the above-discussed deficiencies of Lalonde and combine Rogers with Lalonde as asserted in the Office Action, there would still be no disclosure or suggestion that the resultant system would include a notice control module for controlling a notice of prize information or a registration control module for registering an applicant's information, as claimed. Again, neither Lalonde nor Rogers discloses a system in which applicants apply for a chance to win a prize.

The above points become even more clear when one refers to the PTO's argument on page 4 of the Office Action that "Rogers further discloses a gift (col. 1, lines 35-40; col. 2, lines 20-25)." This citation to Rogers, however, clearly shows that Rogers' system gathers information about a product that was purchased as a gift for someone who is attempting to return that gift without a sales receipt. It is therefore unquestionable that the gift has already been purchased and is in no way being offered as a prize.

Eggleston discloses a system in which a registered user participates in incentive programs, such as frequent flyer miles programs, offered over computer networks. That is, consumers must first participate in the incentive program by purchasing a certain predefined amount of a product or service before receiving the incentive as an award for past purchasing history. These incentive program participants are not applicants who have applied for a prize, as claimed. Rather, the incentive program participants (as opposed to applicants) must typically first purchase a substantial amount of a product or service before being "rewarded."

In view of all of the foregoing, reconsideration and withdrawal of the §103 rejection are respectfully requested.

If the Examiner believes that contact with Applicant's attorney would be advantageous toward the disposition of this case, the Examiner is herein requested to call Applicant's

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attorney at the phone number noted below.

The Commissioner is hereby authorized to charge any additional fees associated with this communication or credit any overpayment to Deposit Account No. 50-1446.

Respectfully submitted,

January 25, 2005

Date

Steven W. Caldwell

Steven W. Caldwell

Reg. No. 51,525

SWC/tlp

BURR & BROWN
P.O. Box 7068
Syracuse, NY 13261-7068

Customer No.: 025191
Telephone: (315) 233-8300
Facsimile: (315) 233/8320